

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Applications of AT&T Inc.)	
and Deutsche Telekom AG)	
for Consent to the Transfer)	
Of Control of Licenses and Authorizations)	WT Docket No. 11-65
Held By T-Mobile USA, Inc. and Its)	
Subsidiaries to AT&T, Inc.)	
)	
For Consent To Assign or Transfer)	
Control of Licenses and Authorizations)	

**COMMENTS OF
THE TECHNOLOGY NETWORK (“TECHNET”)**

Rey Ramsey
President and Chief Executive Officer
TechNet
805 15th St NW, Ste 708
Washington, D.C. 20005
(202) 650-5100

Dated: June 8, 2011

The Technology Network (“TechNet”), which represents the nation’s leading technology companies in support of policies to strengthen the nation’s innovation-driven global competitiveness, submits these comments to express our views on the proposed merger between AT&T and T-Mobile (WT Docket No 11-65). TechNet is the bipartisan policy and political network of CEOs that promotes the growth of the innovation economy. TechNet sees opportunities for job-creating investments in the combined AT&T-T-Mobile network, as well as easing constraints on the utilization of increasingly scarce spectrum. Expanding the capability and capacity of broadband spectrum is of critical importance to TechNet’s member companies. Such increased broadband spectrum will allow our members to grow their business in the technologies, services, software and equipment that make apps, social networking, mobile banking and payments, long-distance learning, mobile commerce, energy management and countless other activities possible. TechNet urges policymakers to keep these potential upsides in mind when considering this merger. Specifically, TechNet sees three opportunities associated with this proposed merger.

First, a combined AT&T and T-Mobile could help alleviate an impending shortage of spectrum while also accelerating the deployment of wireless broadband nationwide. The two companies have complementary spectrum assets that, when combined, promise efficiencies in the use of spectrum that effectively increase overall spectrum supply. Among the possible consequences of combining the two companies’ spectrum assets is a more rapid rollout of a national 4G Long Term Evolution (LTE) network. An AT&T-T-Mobile merger could mean that a fourth generation wireless broadband network would get to more Americans faster.

Second, the proposed merger is consistent with goals laid out in the National Broadband Plan (NBP) to increase the availability of spectrum. The NBP points out the growing demand for

spectrum in America and spectrum's role as the "great enabler" for social and economic advancement.¹ Although a range of policy initiatives are necessary to better allocate and utilize spectrum, the combined spectrum assets of AT&T and T-Mobile can be an ingredient in making wireless broadband more quickly and widely available throughout America.

Third, a combined AT&T and T-Mobile could also foster job creation. To meet AT&T's commitment to cover 97% of the U.S. population with an LTE network, the combined companies would make sizable additional investments in the network build-out to accomplish this goal. This means jobs for workers in the industries that build wireless broadband networks.

TechNet is not now taking a position on any conditions that may be placed on this proposal by any government agency. We appreciate you taking our perspectives under consideration.

Dated: June 8, 2011

Respectfully Submitted,

The Technology Network ("TechNet")

By _____/s/_____

Rey Ramsey
President and Chief Executive Officer
TechNet
805 15th St NW, Ste 708
Washington, D.C. 20005
(202) 650-5100

¹ Chapter 5 of the National Broadband Plan discusses the growing need for spectrum and the need to accelerate the pace at which new spectrum is made available in the marketplace. See "Connecting America: The National Broadband Plan." Available online at: <http://www.broadband.gov/plan/5-spectrum/>